



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 RESEARCH PLACE, ROCKVILLE, MD 20850

March 10, 2021

Ben Favret  
Subcommittee Chair, ASTM F15.79  
ASTM International  
100 Barr Harbor Drive  
West Conshohocken, PA 19428

Dear Mr. Favret:

U.S. Consumer Product Safety Commission (CPSC) staff has reviewed the draft Market Umbrellas test method proposed as Item 14 on ASTM's ballot F15 (21-01). Staff is abstaining on the vote, but we would like to provide the following comments to the draft test method.<sup>1</sup>

Although the scope section of the proposed test method mentions including beach umbrellas, the test procedure describes how to test only market umbrellas that are intended to be used with a base or stanchion. Written this way, the draft test method would not allow beach umbrellas to be tested under normal use conditions, such as planted directly in sand. CPSC staff understands the subcommittee is aware of reports of runaway beach umbrellas, resulting in several serious injuries and one fatality. We ask the subcommittee to expand the standard to address fully the hazards of injuries and death due to beach umbrellas implanted in the sand. In addition, we suggest mentioning the known fatality in the introduction of the standard, along with the injury data already there.

Thank you for this opportunity to comment. CPSC staff looks forward to continued collaboration on this and related voluntary standards. If you have any questions, or need additional information, you can contact me at: [anewens@cpsc.gov](mailto:anewens@cpsc.gov), or at: (301) 987-2248.

Sincerely,

Andrew Newens  
Mechanical Engineer  
Project Manager, F15.79

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<sup>1</sup> The comments in this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.



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Cc: Molly Lynyak, ASTM F15 Staff Manager  
Patricia Edwards, CPSC Voluntary Standards Coordinator